

LPDES PERMIT NO. LA0007498, AI No. 2866

LPDES STATEMENT OF BASIS
FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM
(LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA

- I. **Company/Facility Name:** West Fraser Inc.
Joyce Sawmill
Post Office Drawer 1
Joyce, Louisiana 71440
- II. **Issuing Office:** Louisiana Department of Environmental Quality
(LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
- III. **Prepared By:** Sonja Loyd
Industrial Permits Section
Water Permits Division
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Date Prepared: July 9, 2008

IV. **Permit Action/Status:**

A. Reason For Permit Action:

Proposed reissuance of an expired Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46*.

- * In order to ease the transition from NPDES to LPDES permits, dual regulatory references are provided where applicable. The LAC references are the legal references while the 40 CFR references are presented for informational purposes only. In most cases, LAC language is based on and is identical to the 40 CFR language. 40 CFR Parts 401, 405-415, and 417-471 have been adopted by reference at LAC 33:IX.4903 and will not have dual references. In addition, state standards (LAC Chapter 33:IX.11) will not have dual references.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, and 2301.F.

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- B. LPDES permit - LPDES permit effective date: November 1, 2002
 LPDES permit expiration date: October 31, 2007
- C. Application received on May 1, 2007. Additional information received via telephone on July 11, 2008.

V. Facility Information:

- A. Location - 6481 Highway 34, 1/2 mile north of the U.S. Highway 84 intersection, in Joyce, Winn Parish (Latitude 31°56'49", Longitude 92°35'27")

- B. Applicant Activity -

According to the application, West Fraser Inc., Joyce Sawmill is an existing sawmill facility.

- C. Technology Basis - (40 CFR Chapter 1, Subchapter N/Parts 401, 405-415, and 417-471 have been adopted by reference at LAC 33:IX.4903)

Guideline

Timber Products Processing
 Point Source Category

Reference

40 CFR 429,
 Subparts A, I, and K

Other sources of technology based limits:

Current Permit (effective November 1, 2002)
 LDEQ Sanitary General Permits
 Best Professional Judgement

- D. Fee Rate -
 - 1. Fee Rating Facility Type: Minor
 - 2. Complexity Type: II
 - 3. Wastewater Type: III
 - 4. SIC code: 2421

- E. Continuous Facility Effluent Flow - 2.02 MGD (Max 30-Day)

VI. Receiving Waters:

STREAM - unnamed drainage canal, thence into Black Bayou

BASIN AND SUBSEGMENT - Ouachita River, Subsegment No. 081402

DESIGNATED USES - a. primary contact recreation
 b. secondary contact recreation
 c. fish and wildlife propagation

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VII. Outfall Information:

Outfall 001

- A. Type of wastewater - stormwater runoff, treated sanitary wastewater, log spray pond overflow, general service washdown water, air compressor condensate, boiler blowdown, non-contact cooling water, and fire protection service water
- B. Location - at the point of discharge from the pond outfall, located on the northeast side of the facility, prior to combining with other waters at 31°57'13", Longitude 92°34'49".
- C. Treatment - treatment of these wastewaters consists of:
 - Settling and aeration (35-acre retention pond)
 - Chlorination (sanitary wastewater only)
- D. Flow - Continuous, (Max 30-Day) 2.02 MGD
- E. Receiving waters - unnamed drainage canal, thence into Black Bayou
- F. Basin and subsegment - Ouachita Basin, Subsegment No. 081402

Outfall 002

- A. Type of wastewater - treated sanitary wastewater and wash basin water
- B. Location - at the point of discharge from the pond outfall, located on the southwest side of the facility, prior to combining with other waters at 31°56'30", Longitude 92°35'15".
- C. Treatment - treatment of sanitary wastewaters consists of:
 - settling (3.1-acre retention pond)
- D. Flow - Intermittent, (Max 30-Day) 0.000225 MGD.
- E. Receiving waters - unnamed drainage canal, thence into Black Bayou
- F. Basin and subsegment - Ouachita Basin, Subsegment No. 081402

VIII. Proposed Permit Limits:

Summary of Proposed Changes From the Current LPDES Permit:

- A. On or about February 19, 2007, this Office was notified that the permittee's name was changed from West Fraser (South), Inc. to West Fraser Inc.

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B. Outfall 001

The description of wastestreams listed in the current permit as discharging from this outfall are stormwater runoff, treated sanitary wastewater, log spray water, washdown water, and process water. The term "process wastewater" was previously used to identify the following wastestreams: boiler blowdown, non-contact cooling water, washdown water, and kiln condensate. However, according to the effluent guidelines that apply to this facility, no process wastewater pollutants shall be discharged into navigable waters. This term specifically excludes utility wastewater under the general provisions cited at 40 CFR 429.11(c). In a recent correspondence from Donald Anderson with the United States Environmental Protection Agency (dated March 25, 2008), a determination was made classifying kiln condensate as a process wastewater. Therefore, the description of wastestreams being discharged at this outfall will be changed to reflect stormwater runoff, treated sanitary wastewater, log spray pond overflow, general service washdown water, air compressor condensate, boiler blowdown, non-contact cooling water, and fire protection service water. Based on information provided in the 2007 Application, kiln condensate is no longer being discharged to waters of the state since the permittee now captures and recycles kiln condensate into the production processes.

C. Outfall 002

The statistical basis for Fecal Coliform will be changed from a weekly average to a daily maximum.

The outfall location description will be changed from "at the point of discharge from the lagoon, located on the southwest side of the facility, prior to combining with other waters" to "at the point of discharge from the pond outfall, located on the southwest side of the facility, prior to combining with other waters".

- D. In an effort to adequately evaluate the discharges from Outfalls 001 and 002, a provision requiring the submittal of sample data not provided in the 2007 Application will be added to the reopener clause in Part II, Paragraph G of the draft permit. This provision requires the facility to submit sample data for these outfalls within one (1) year after the effective date of the permit in accordance with LAC 33:IX.2501.G.7.c. Upon submittal of the sample data, the LDEQ may choose to modify this permit to change the effluent limits based on this information.

- E. The facility discharges to a Water Quality Act 303(d) stream. Therefore, a reopener clause will be added to Part II of the draft permit in the event that the permit requires reassessment regarding

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303(d) status resulting in incorporation of the results of any future Total Maximum Daily Load (TMDL) allocation for the receiving waterbody.

- F. Updated Part II conditions for stormwater discharges associated with industrial activities will be established in the draft permit.
- G. The provision in the Part II conditions that required submittal of DMRs to the Northeast Regional Office will be removed from the draft permit. All DMRs sent to the Office of Environmental Compliance/Permit Compliance Unit are scanned into the Electronic Document Management System which is accessible to all LDEQ personnel.

IX. Permit Limit Rationale:

The following section sets forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit.

- A. Outfall 001 - stormwater runoff, treated sanitary wastewater, log spray pond overflow, general service washdown water, air compressor condensate, boiler blowdown, non-contact cooling water, and fire protection service water

These wastestreams being discharged to a discrete outfall receive BPJ limits and monitoring requirements according to the following schedule:

PARAMETERS	MONTHLY AVERAGE	DAILY MAXIMUM	MONITORING FREQUENCY
Flow (MGD)	Report	Report	Continuous
BOD ₅	30 mg/L	45 mg/L	1/week
TSS	30 mg/L	45 mg/L	1 week
Fecal Coliform (COLONIES/100 ml)	---	400	1/6 months
pH	6.0 S.U. (Min)	9.0 S.U. (Max)	1/week

Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.1.1.b. These requirements have been retained from the current permit, effective November 1, 2002.

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BOD₅, TSS, and Fecal Coliform - limits are established by BPJ. These requirements have been retained from the current permit, effective November 1, 2002.

pH - limits are established in accordance with LAC 33:IX.1113.C.1. These requirements have been retained from the current permit, effective November 1, 2002.

Storm Water Pollution Prevention Plan (SWP3) Requirements

In accordance with LAC 33:IX.2707.1.3 and [40 CFR 122.44(I)(3) and (4)], a Part II condition is proposed for applicability to all storm water discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. The Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit, along with other requirements. If the permittee maintains other plans that contain duplicative information, those plans could be incorporated by reference to the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasures Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of stormwater associated with industrial activity, as defined in LAC 33:IX.2522.B.14 [40 CFR 122.26(b)(14)].

B. Outfall 002 - treated sanitary wastewater and wash basin water

Treated sanitary wastewater and wash basin water being discharged to a discrete outfall receive BPJ limits and monitoring frequency according to the following schedule:

PARAMETERS	MONTHLY AVERAGE	WEEKLY AVERAGE	MONITORING FREQUENCY
Flow (MGD)	Report	Report	1/6 months
BOD ₅	---	45 mg/L	1/6 months
TSS	---	135 mg/L	1/6 months
Fecal Coliform (COLONIES/100 ml)	---	400 (*1)	1/6 months
pH	6.0 S.U. (Min)	9.0 S.U. (Max)	1/6 months

(*1) The statistical basis for Fecal Coliform shall be a daily maximum in lieu of a weekly average.

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Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.1.b. These requirements have been retained from the current permit, effective November 1, 2002.

BOD₅, TSS, and Fecal Coliform - limits are established in accordance with LDEQ Sanitary Discharge General Permits. These requirements have been retained from the current permit, effective November 1, 2002.

pH - limits are established in accordance with LAC 33:IX.1113.C.1. These requirements have been retained from the current permit, effective November 1, 2002.

X. TMDL Waterbodies:

Subsegment No. 081402 of the Ouachita River Basin is listed on the 2006 Final Integrated 303(d) List as being impaired with fecal coliform. A TMDL will be scheduled following completion of the EPA Consent Decree TMDL Schedule. Based on an evaluation of these discharges, it was determined that the permittee has the potential to discharge constituents that could contribute to this impairment. Therefore, the limits and monitoring requirements for Fecal Coliform will be retained in the draft permit.

A reopener clause will be established in the permit to allow for the requirement of more stringent limits and requirements as imposed by a future TMDL.

XI. Compliance History/DMR Review:

A compliance history/DMR review was performed for the period of March 2005 through March 2008:

A. DMR Excursions Reported

Date	Parameter	Outfall	Reported Value	Permit Limits
03/08	TSS	001	56.7 mg/L	45 mg/L
07/07- 12/07	Fecal Coliform	002	1,530 COL/100 ml	400 COL/100 ml
01/06- 06/06	Fecal Coliform	002	580 COL/100 ml	400 COL/100 ml
12/06	Fecal Coliform	001	> 2,000 COL/100 ml	400 COL/100 ml

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Date	Parameter	Outfall	Reported Value	Permit Limits
07/06- 12/06	Fecal Coliform	002	770 COL/100 ml	400 COL/100 ml

B. Inspection - The most recent water inspection was performed on September 16, 2003. No areas of concern were noted.

C. Compliance History - None

XII. Endangered Species:

The receiving waterbody, Subsegment No. 081402 of the Ouachita Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

XIII. Historic Sites:

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

XIV. Tentative Determination:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

XV. Variances:

No requests for variances have been received by this Office.

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XVI. Public Notices:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List